

1 KAMALA D. HARRIS
Attorney General of California
2 KAREN B. CHAPPELLE
Supervising Deputy Attorney General
3 WILLIAM D. GARDNER
Deputy Attorney General
4 State Bar No. 244817
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2114
6 Facsimile: (213) 897-2804
Attorneys for Complainant
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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues
12 Against:

Case No. *2013-719*

13 **RAJINDERPAL KAUR GURM**

STATEMENT OF ISSUES

14 **Registered Nurse License Applicant**

15 Respondent.

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17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Statement of Issues solely in
20 her official capacity as the Executive Officer of the Board of Registered Nursing, Department of
21 Consumer Affairs.

22 2. On or about October 3, 2011, the Board of Registered Nursing, Department of
23 Consumer Affairs received an application for a Request for Reapply/Repeat Examination from
24 Rajinderpal Kaur Gurm (Respondent). On or about September 27, 2011, Rajinderpal Kaur Gurm
25 certified under penalty of perjury to the truthfulness of all statements, answers, and
26 representations in the application. The Board denied the application on June 12, 2012.

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1 BM792785B), Respondent entered a plea of no contest and was found guilty of violating Penal
2 Code Section 488 [Petty Theft]. Judgment was deferred pursuant to a plea agreement, however,
3 and Respondent was allowed to enter a Deferred Entry of Judgment Program. Upon her
4 successful completion of that program, on or about December 16, 2011, Respondent was
5 permitted to change her plea to not guilty, and the case was dismissed pursuant to Penal Code
6 section 1203.4.

7 PRAYER

8 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
9 and that following the hearing, the Board of Registered Nursing issue a decision:

- 10 1. Denying the application of Rajinderpal Kaur Gurm for an Applicant for Registered
11 Nurse License;
12 2. Taking such other and further action as deemed necessary and proper.

13 DATED: MARCH 5, 2013


14 LOUISE R. BAILEY, M.ED., RN
15 Executive Officer
16 Board of Registered Nursing
17 Department of Consumer Affairs
18 State of California
19 Complainant

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